

1 MAUREEN E. MCCLAIN (State Bar No. 062050)
 2 Email: mcclain@kmm.com
 3 ALEX HERNAEZ (State Bar No. 201441)
 4 Email: hernaez@kmm.com
 5 KAUFF MCCLAIN & MCGUIRE LLP
 One Post Street, Suite 2600
 San Francisco, California 94104
 Telephone: (415) 421-3111
 Facsimile: (415) 421-0938

6 Attorneys for Defendant
 7 DOLLAR TREE STORES, INC.

8 BETH HIRSCH BERMAN (VA Bar No. 28091)
 9 Email: bberman@williamsmullen.com
 WILLIAMS MULLEN
 999 Waterside Drive
 10 1700 Dominion Tower
 Norfolk, VA 23510
 Telephone: (757) 629-0604
 11 Facsimile: (757) 629-0660

12 *Pro Hac Vice* Attorneys for Defendant
 13 DOLLAR TREE STORES, INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16
 17 KASSONDRA BAAS and KELLY LOFQUIST,
 18 individually and on behalf of all others
 similarly situated,

CASE NO. C 07-03108 JSW
DECLARATION OF JOE ESTRADA

19 Plaintiffs,
 20 v.
 21 DOLLAR TREE STORES, INC.,

22 Defendant.

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1 I, Joe Estrada, hereby declare as follows:

2 1. I am a certified interpreter, certification no. 01424780. I am fluent in
 3 both English and Spanish. I provide this declaration in order to explain the translating
 4 services that I have provided at the request of Dollar Tree Stores, Inc.'s ("Dollar Tree")
 5 attorney, Rossana S. Eltanai. I have personal knowledge of the facts stated in this
 6 declaration and would testify thereto if called as a witness in the above-captioned matter.

7 2. On December 27, 2007, Ms. Eltanai and I met with Jose Baeza at
 8 the Dollar Tree store located in Rohnert Park. Mr. Baeza is fluent in Spanish. I served
 9 as an interpreter for the interview between Ms. Eltanai and Mr. Baeza. During the
 10 meeting, I was able to communicate clearly and effectively with Mr. Baeza. Moreover,
 11 Mr. Baeza stated that he was willing to sign a declaration setting forth certain facts
 12 regarding his employment at Dollar Tree.

13 3. On January 9, 2008, with the assistance of another interpreter in my
 14 office, I prepared a written, Spanish translation of the declaration of Mr. Baeza drafted by
 15 Ms. Eltanai in English. A true and correct copy of the declaration of Jose Baeza in
 16 English is attached hereto as **Exhibit A**. A true and correct copy of the declaration of
 17 Jose Baeza translated correctly into Spanish is attached hereto as **Exhibit B**.

18 4. On January 15, 2008, I met again with Mr. Baeza and Ms. Eltanai at
 19 the Dollar Tree store in Rohnert Park. A copy of the declaration in Spanish was provided
 20 to Mr. Baeza for his review. I also read to him, verbatim in Spanish, the declaration. Mr.
 21 Baeza then voluntarily signed both declarations. See Exhibits A and B.

22 I have read this declaration, and do hereby declare, under penalty of
 23 perjury under the laws of the United States of America that it is true and correct.

24 Executed this 11 day of March 2008 in Santa Rosa, California.

25 
 26 JOE ESTRADA

27 4846-1764-4290.1

28 DFCI ARATION OF JOE ESTRADA

EXHIBIT A

MAUREEN E. McCLAIN (State Bar No. 062050)
Email: mcclain@kmm.com
ALEX HERNAEZ (State Bar No. 201441)
Email: hernaez@kmm.com
KAUFF McCLAIN & McGUIRE LLP
One Post Street, Suite 2600
San Francisco, California 94104
Telephone: (415) 421-3111
Facsimile: (415) 421-0938

Attorneys for Defendant
DOLLAR TREE STORES, INC.

BETH HIRSCH BERMAN (VA Bar No. 28091)
Email: bberman@williamsmullen.com
WILLIAMS MULLEN
Dominion Tower, Suite 1700
999 Waterside Drive
Norfolk, VA 23510
Telephone: (757) 629-0604
Facsimile: (757) 629-0660

Pro Hac Vice Attorneys for Defendant
DOLLAR TREE STORES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KASSONDRA BAAS and KELLY
LOFQUIST, individually and on behalf of all
others similarly situated.

Plaintiffs.

1

DOLLAR TREE STORES, INC.

Defendant.

CASE NO. C 07-03108 JSW

DECLARATION OF JOSE BAEZA

ENGLISH VERSION

This document has been translated into Spanish by JOE ESTRADA,
C.C.I., Certification No. 01424780.

1 I, Jose Baeza, do hereby declare:

2 1. All the facts contained in this Declaration are based on my own
 3 personal knowledge and, if called as a witness, I could competently testify to them.

4 2. I am providing this Declaration voluntarily. Dollar Tree Stores, Inc.
 5 ("Dollar Tree") has informed me that providing or not providing this Declaration will not
 6 affect my employment with Dollar Tree.

7 3. I am currently employed as an Assistant Manager by Dollar Tree at
 8 store number 1868 in Rohnert Park, California. I was hired as a stocker approximately 6
 9 years ago.

10 4. I have never worked off the clock at Dollar Tree. No Store Manager
 11 has asked me to work off the clock. No Store Manager has asked me to continue
 12 working without pay after my shift ended. I do not know of any other employee who has
 13 worked off the clock.

14 5. Dollar Tree has compensated me for all overtime hours I have
 15 worked. I have not worked any overtime at Dollar Tree in the last 2 to 3 years.

16 6. I have not had any pay issues with Dollar Tree or any Store
 17 Manager. I have not had any problems receiving payment on time for the hours I
 18 worked. I have not heard of other employees having pay issues at Dollar Tree.

19 7. I remember another Dollar Tree employee named Kassondra Baas
 20 who worked at the Rohnert Park store. However, I did not know anything about her. I
 21 recall that we worked during different shifts.

22 8. I do not recall working with a Dollar Tree employee named Kelly
 23 Lofquist.

24 I have read the above Declaration and do hereby declare under penalty of
 25 perjury under the laws of the United States of America that it is true and correct.

26 Executed this 15 day of January, 2008 in Rohnert Park, California.

27
 28 JOSE BAEZA

EXHIBIT B

1 MAUREEN E. McCLAIN (State Bar No. 062050)
 2 Email: mcclain@kmm.com
 2 ALEX HERNAEZ (State Bar No. 201441)
 3 Email: hernaez@kmm.com
 3 KAUFF McClain & McGuire LLP
 4 One Post Street, Suite 2600
 4 San Francisco, California 94104
 5 Telefono: (415) 421-3111
 5 Facsimile: (415) 421-0938

6 Abogados del Demandado
 7 DOLLAR TREE STORES, INC.

7 BETH HIRSCH BERMAN (VA Bar No. 28091)
 8 Email: bberman@williamsmullen.com
 8 WILLIAMS MULLEN
 9 Dominion Tower, Suite 1700
 9 999 Waterside Drive
 10 Norfolk, VA 23510
 10 Telefono: (757) 629-0604
 11 Fax: (757) 629-0660

12 *Pro Hac Vice* Abogados del Demandado
 13 DOLLAR TREE STORES, INC.

14 CORTE DEL DISTRITO DE LOS ESTADOS UNIDOS
 15 DISTRITO DEL NORTE DE CALIFORNIA

17 KASSONDRA BAAS y KELLY LOFQUIST,
 18 individualmente y a nombre de otros en
 18 situación similar,

19 Demandante,

21 V.

22 DOLLAR TREE STORES, INC.,

23 Demandado.

CASO NO. C 07-03108 JSW

**DECLARACION DE JOSE
 BAEZA**

VERSION EN ESPAÑOL

25 Este documento ha sido traducido al español por JOE ESTRADA, C.C.I.,
 26 Número de Certificación. 01424780.

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1 Yo, Jose Baeza, mediante la presente declaro:

2 1. Todos los hechos contenidos en esta Declaración estan basados en
 3 mi conocimento personal, y si me requieren como testigo, yo puedo testificar
 4 competentemente.

5 2. Estoy proporcionando esta Declaración voluntariamente. Dollar
 6 Tree Stores, Inc. ("Dollar Tree") me ha informado que proporcionando o no
 7 proporcionando esta Declaración no afectara mi empleo en Dollar Tree.

8 3. Actualmente estoy empleado en Dollar Tree como Asistente de
 9 Gerente en la tienda número 1868 en Rohnert Park, California. Fuí contratado como
 10 almacenador hace aproximadamente 6 años.

11 4. Nunca he trabajado más de lo que maracaba el reloj en Dollar Tree.
 12 Ningún Gerente de Tienda me ha pedido que trabaje más de lo que marca el reloj.
 13 Ningún Gerente de Tienda me ha pedido que continue trabajando sin pagarme despues
 14 de que mi jornada de trabajo ha terminado. No se de ningún otro empleado que haya
 15 trabajado fuera de su jornada.

16 5. Dollar Tree me ha compensado por todas las horas de tiempo extra
 17 que he trabajado. No he trabajado tiempo extra en los últimos 2 o 3 años.

18 6. No he tenido ningún problema de pago con Dollar Tree o con un
 19 Gerente de Tienda. No he tenido ningún problema para recibir mi pago a tiempo por las
 20 horas que he trabajado. No he escuchado que algún otro empleado tenga problemas
 21 con sus pagos en Dollar Tree.

22 7. Recuerdo a otro empleado de Dollar Tree llamada Kassondra Baas
 23 que trabajo en la tienda de Rohnert Park. Sin embargo, no se nada acerca de ella.
 24 Recuerdo que trabajamos diferentes jornadas.

25 8. No recuerdo trabajar en Dollar Tree con una empleada llamada
 26 Kelly Lofquist.

1 He leído esta Declaración y mediante la presente declaro bajo
2 penalización por falso testimonio bajo las leyes de los Estados Unidos de America que
3 esto es correcto y verdadero.

4 Ejecutado este 15 día de Enero del 2008 en Rohnert Park, California.

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JOSE BAEZA